

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

GOLDEN BETHUNE-HILL, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:14-cv-00852-REP-GBL-BMK
)	
VIRGINIA STATE BOARD OF)	
ELECTIONS, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**DEFENDANTS' UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING**

COME NOW, the Virginia State Board of Elections, Charlie Judd, Kimberly Bowers, James B. Alcorn, the Virginia Department of Elections, and Edgardo Cortes (collectively, "Defendants"), by counsel, and respectfully request this Court grant this Unopposed Motion for an Extension of Time to File a Responsive Pleading. In support thereof, Defendants state as follows:

1. On December 22, 2014, Plaintiffs filed their Complaint alleging, *inter alia*, a violation of the Equal Protection Clause of the United States Constitution based on the Virginia House of Delegates 2011 Redistricting Plan.
2. On January 12, 2015, Defendants were served with the Summons and Complaint.
3. Thus, Defendants responsive pleading is currently due February 2, 2015.
4. Federal Rule of Civil Procedure 6(b) states, in relevant part, "[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires. . . ." Fed. R. Civ. Pro. 6(b)(1).

5. The Defendants' request for an extension of time is made before the original time by which they must file responsive pleadings has expired. Accordingly, the Court may extend the time for good cause. There is good cause for the requested extension, because (a) the Plaintiffs raise fact-intensive and complex legal issues in their Complaint, (b) the ends of justice will be served by permitting counsel time to thoroughly investigate the issues raised in the Complaint, and (c) the requested extension will have no material, adverse effect on any party or on the expeditious disposition of this case.

6. On January 26, 2015, counsel for Defendants spoke with Plaintiffs' counsel who did not oppose an extension of 16 days to file a responsive pleading in this matter.

WHEREFORE, Defendants, by counsel, respectfully request the Court enter the accompanying Order providing them an additional 16 days to file a responsive pleading in this matter, or until February 18, 2015.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of January, 2015, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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